



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

Orig sent to
JJBrown LCE-164
JMC



1118 F Street • Lewiston, ID 83501 • (208) 799-4370

C. L. "Butch" Otter, Governor
Toni Hardesty, Director

June 2, 2010

The Honorable Jim Martin
Mayor of City of Elk River
P.O. Box H, 112 South 2nd Street
Elk River, Idaho 83827

Subject: 2010 WWTP NPDES Permit Compliance Inspection, NPDES Permit ID-002036-2
Elk River, Idaho

Dear Mayor Martin:

On April 30, 2010, the Idaho Department of Environmental completed the NPDES permit compliance inspection of the City of Elk River's wastewater treatment plant. Mr. Wade Matthes provided a tour of the facilities and was interviewed for the inspection checklist. The inspection report and photo log are enclosed.

The following discrepancies were noted during the inspection.

Elk River currently discharges to Elk Creek under the authority of an NPDES permit that expired April 30, 2009. The cover of the NPDES permit states, *"This permit and the authorization to discharge shall expire at midnight, April 30, 2009."*

Elk River applied for a new NPDES permit on March 31, 2009 to the United States Environmental Protection Agency (USEPA), which violates the requirements of Part IV.B which states, *"In accordance with 40 CFR 122.21(d), and unless permission for the application to be submitted at a later date has been granted by the Director, the permittee must submit a new application at least 180 days before the expiration date of this permit."* In order to meet this requirement, Elk River should have applied for a new permit on or before November 1, 2008.

Elk River did not submit a Surface Water Monitoring Report to the USEPA, as required in Part I.C.4, which states, *"Surface Water Monitoring Report: Surface water monitoring results must be submitted to EPA with the next NPDES permit renewal application, which is due 180 days prior to the expiration date of the permit. A copy of the results must also be submitted to IDEQ."*

Elk River cannot meet the chlorine limits established in Part I.B.1, which states, *"The permittee must achieve compliance with the chlorine limitations of Part I.A.1. (Table 1), by May 1, 2007."*

Elk River did not submit semi-annual reports on the city's efforts to achieve compliance with the chlorine limits set for in the permit. Part I.B.2 states, *"Until compliance with the effluent limits is achieved, the permittee must submit a 6-month Report of Progress which outlines the progress made towards reaching the compliance date for the chlorine effluent limitations. The 6-month Report of Progress must be submitted by November 1, 2004, and every six months thereafter until the final effluent limits are achieved."*

Elk River's operation and maintenance manual does not reflect current operations practices or equipment, as required in Part I.D.

Elk River does not submit monthly DMR's by the 15th of the following month. Part II.B.1 states, "*The permittee must summarize monitoring results each month on the Discharge Monitoring Report (DMR) form (EPA No. 3320-1) or equivalent or forms provided or specified by the Director for reporting results of monitoring of sludge use or disposal practices. The permittee must submit reports monthly, postmarked by the 15th day of the following month.*"

Elk River does not provide 24-hour notice of non-compliance with daily limit or instantaneous limit as required in Part II.G.1.d, which states, "*The permittee must report the following occurrences of noncompliance by telephone within 24 hours from the time the permittee becomes aware of any violation of a maximum daily or instantaneous maximum discharge limitation for any of the pollutants in Table 1 of Part I.A.*"

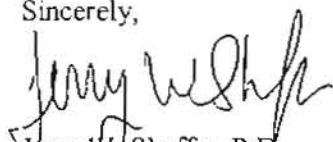
Elk River does not provide a 5-day written notice of non-compliance with daily limit or instantaneous limit, as required in Part II.G.2, which states, "*The permittee must also provide a written submission within five days of the time that the permittee becomes aware of any event required to be reported under subpart 1, above.*"

Elk River did not provide compliance reports to USEPA as required by Part II.J, which states, "*Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit must be submitted no later than 14 days following each schedule date.*"

The permit cover sheet does not contain the correct mailing address for the facility. The correct address is P.O. Box H, 112 South 2nd Street, Elk River, Idaho 83827.

If you have any questions, please contact Jerry W. Shaffer, P.E. by phone at 208-799-4370 or by e-mail at jerry.shaffer@deq.idaho.gov. Please extend my gratitude to Mr. Matthes for his assistance during the inspection.

Sincerely,



Jerry W. Shaffer, P.E.
Staff Engineer

Enclosures (2)

c: Wade Matthes, City of Elk River
Dawn Shepherd, IDEQ-State Office
Maria Lopez, Environmental Scientist, USEPA, Boise, Idaho

Water Compliance Inspection Report

Section A: National Data System Coding (i.e. PCS)

Transaction Code 1 N 2 5 3 100020362 11	NPDES 12 100430 17	yr/mo/day	Inspection Type 18 C	Inspector 19 A	Fac Type 20 1
Remarks 21					
Inspection Work Days 67 1 69	Facility Self-Monitoring Evaluation Rating 70 3	BI 71 N	QA 72 N	Reserved 73 1 74 1 75 1 76 1 77 1 78 1 79 1 80 1	

Section B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City of Elk City P.O. Box H, 112 South 2nd Street Elk River, Idaho 83827 Clearwater County		Entry Time/Date 0822 2010/04/30	Permit Effective Date 2004/05/01
		Exit Time/Date 1231 2010/04/30	Permit Expiration Date 2009/04/30
Name(s) of On-Site Representative(s)/Title(s)/Phone and Fax Numbers Wade Mathes, Public Works Supervisor Phone 208-826-2230 Fax 208-826-3209		Other Facility Data (e.g., SIC, NAICS, and other descriptive information) SIC code: 4952	
Name, Address of Responsible Official/Title/Phone and Fax Number Jim Martin, Mayor P.O. Box H, 112 South 2nd Street Elk River, Idaho 83827 Phone 208-826-3209 Fax 208-826-3209		Contacted <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

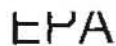
<input checked="" type="checkbox"/> Permit	<input checked="" type="checkbox"/> Self-Monitoring Program	<input type="checkbox"/> Pretreatment	<input type="checkbox"/> MS4
<input checked="" type="checkbox"/> Records/Reports	<input checked="" type="checkbox"/> Compliance Schedule	<input type="checkbox"/> Pollution Prevention	
<input checked="" type="checkbox"/> Facility Site Review	<input checked="" type="checkbox"/> Laboratory	<input type="checkbox"/> Storm Water	
<input checked="" type="checkbox"/> Effluent/Receiving Waters	<input checked="" type="checkbox"/> Operations & Maintenance	<input type="checkbox"/> Combined Sewer Overflow	
<input checked="" type="checkbox"/> Flow Measurement	<input checked="" type="checkbox"/> Sludge Handling/Disposal	<input type="checkbox"/> Sanitary Sewer Overflow	

Section D: Summary of Findings/Comments

(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

SEV Codes <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	SEV Description Permit Cover - Permit expired and still discharging Part IV.B - Permit application less than 180 days prior to expiration Parts I.C.4 and II.B.2 - Surface water monitoring report not submitted. Part I.B.1 - Permittee cannot meet chlorine limits Part I.B.2 - Permittee did not submit semi-annual Progress Reports Part I.D - O&M manual not current or reflect current operation Part II.B.i - Permittee does not submit DMR's by 15th of month.
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Name(s) and Signature(s) of Inspector(s) Jerry W. Shaffer P.E.	Agency/Office/Phone and Fax Numbers IDEO 208-799-4370 phone	Date 2010/06/02
Signature of Management QA Reviewer Jerry W. Shaffer	Agency/Office/Phone and Fax Numbers 208-799-3451 Fax	Date



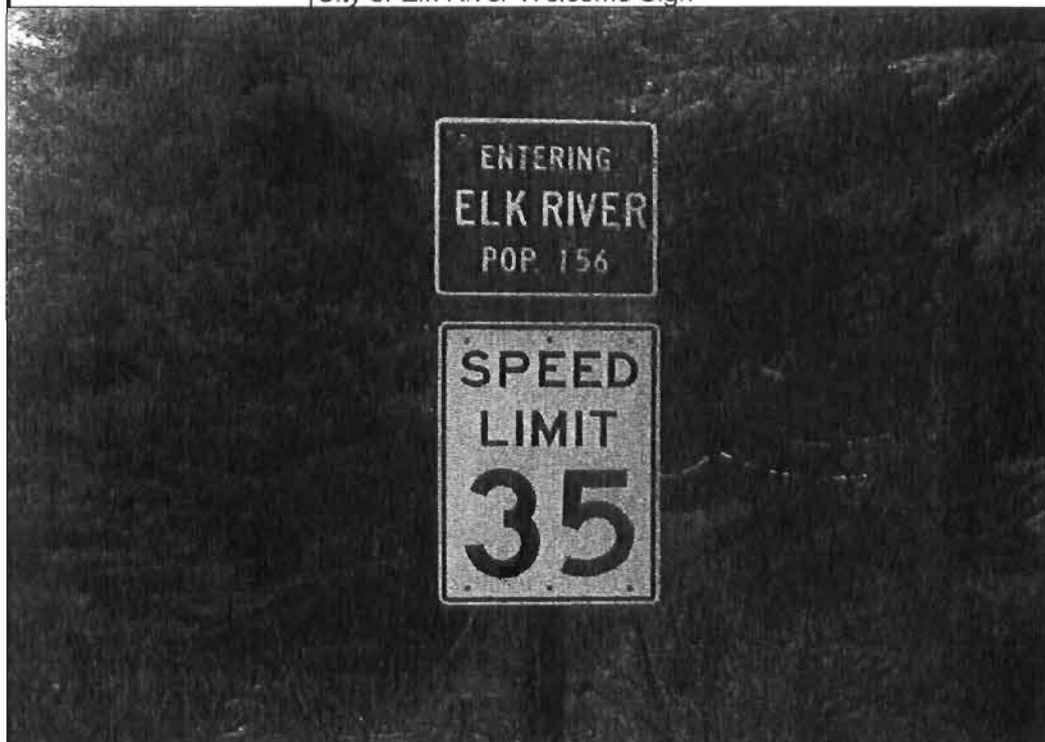
Section A: National Data System Coding (i.e. PCS)

Section B: Facility DataSection C: Areas Evaluated During Inspection (Check only those areas evaluated)Section D: Summary of Findings/Comments

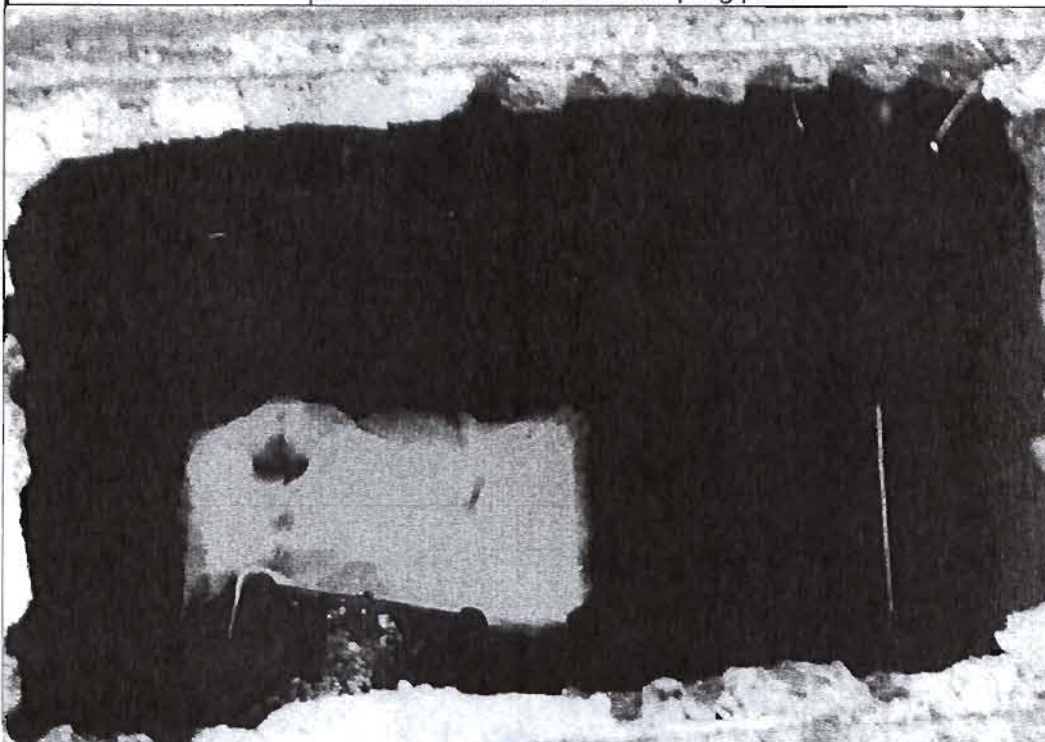
(Attach additional sheets of narrative and checklists, including Single Event Violation codes, as necessary)

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone and Fax Numbers	Date
Jerry W Shaffer P.E.	IDEO 208-799-4370 phone	2/10/06/02
Jerry W Shaffer.	208-799-3451 fax	
Signature of Management QA Reviewer	Agency/Office/Phone and Fax Numbers	Date

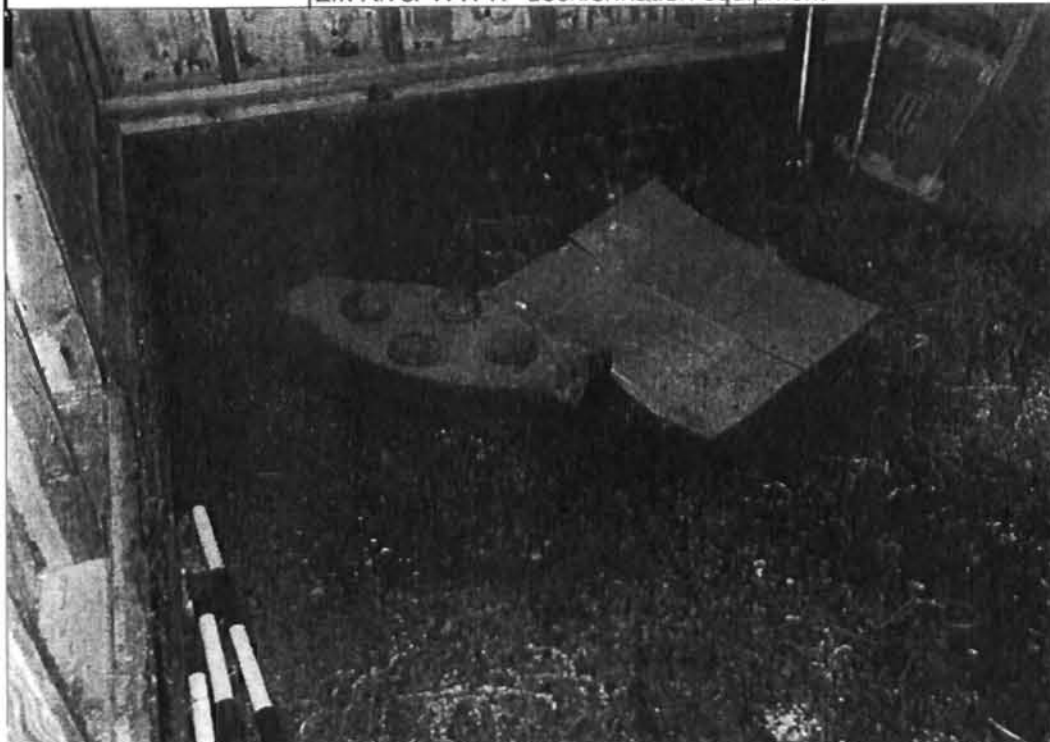
Facility/Site Name		City of Elk River Wastewater Treatment Facility	
Location/Address		P.O. Box H, 112 South 2nd Street, Elk River, ID 83827	
NPDES	ID0020362	Date	4/30/2010
Subject/Comments		City of Elk River Welcome Sign	



Facility/Site Name		City of Elk River Wastewater Treatment Facility	
Location/Address		P.O. Box H, 112 South 2nd Street, Elk River, ID 83827	
NPDES	ID0020362	Date	4/30/2010
Subject/Comments		Elk River WWTP effluent sampling point	




Facility/Site Name		City of Elk River Wastewater Treatment Facility	
Location/Address		P.O. Box H, 112 South 2nd Street, Elk River, ID 83827	
NPDES	ID0020362	Date	4/30/2010
Subject/Comments		Elk River WWTP dechlorination equipment	




Facility/Site Name		City of Elk River Wastewater Treatment Facility	
Location/Address		P.O. Box H, 112 South 2nd Street, Elk River, ID 83827	
NPDES	ID0020362	Date	4/30/2010
Subject/Comments		Elk River WWTP effluent flow meter	



Facility/Site Name		City of Elk River Wastewater Treatment Facility	
Location/Address		P.O. Box H, 112 South 2nd Street, Elk River, ID 83827	
NPDES	ID0020362	Date	4/30/2010
Subject/Comments		Elk River WWTP chlorine day tank and chemical feed pump	
			

Facility/Site Name		City of Elk River Wastewater Treatment Facility	
Location/Address		P.O. Box H, 112 South 2nd Street, Elk River, ID 83827	
NPDES	ID0020362	Date	4/30/2010
Subject/Comments		Elk River WWTP chlorine	



Facility/Site Name		City of Elk River Wastewater Treatment Facility	
Location/Address		P.O. Box H, 112 South 2nd Street, Elk River, ID 83827	
NPDES	ID0020362	Date	4/30/2010
Subject/Comments		Elk River WWTP Cell One Panorama - 1	



Facility/Site Name		City of Elk River Wastewater Treatment Facility	
Location/Address		P.O. Box H, 112 South 2nd Street, Elk River, ID 83827	
NPDES	ID0020362	Date	4/30/2010
Subject/Comments		Elk River WWTP Cell One Panorama - 2	



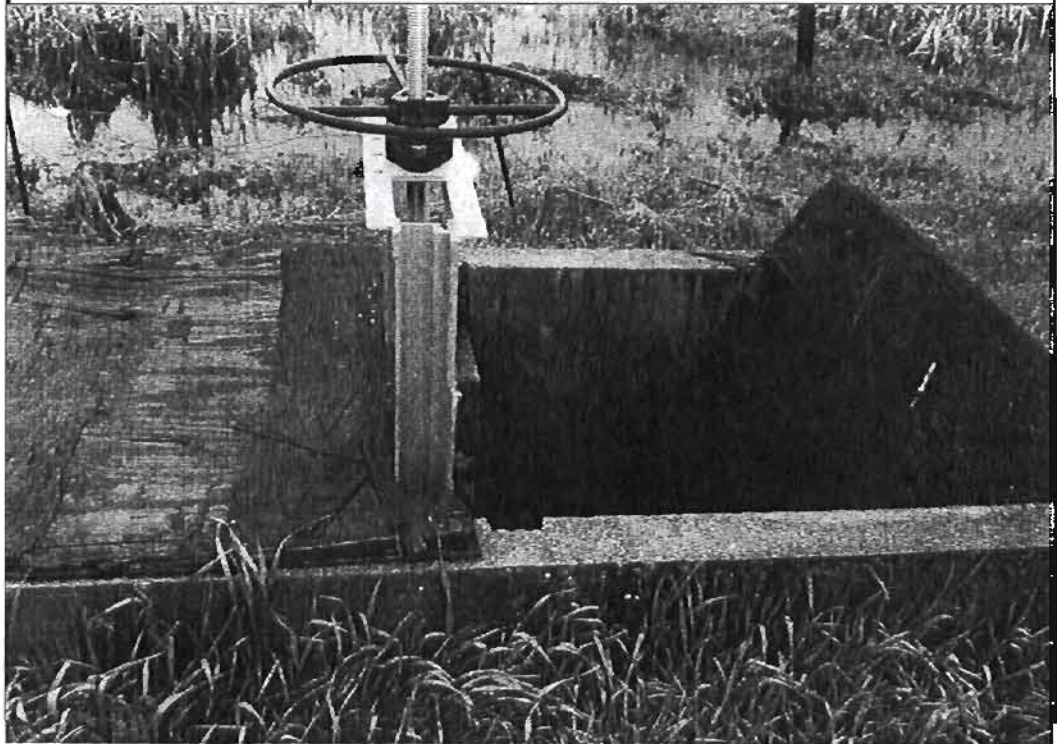
Facility/Site Name		City of Elk River Wastewater Treatment Facility	
Location/Address		P.O. Box H, 112 South 2nd Street, Elk River, ID 83827	
NPDES	ID0020362	Date	4/30/2010
Subject/Comments		Elk River WWTP inlet/outlet structure	



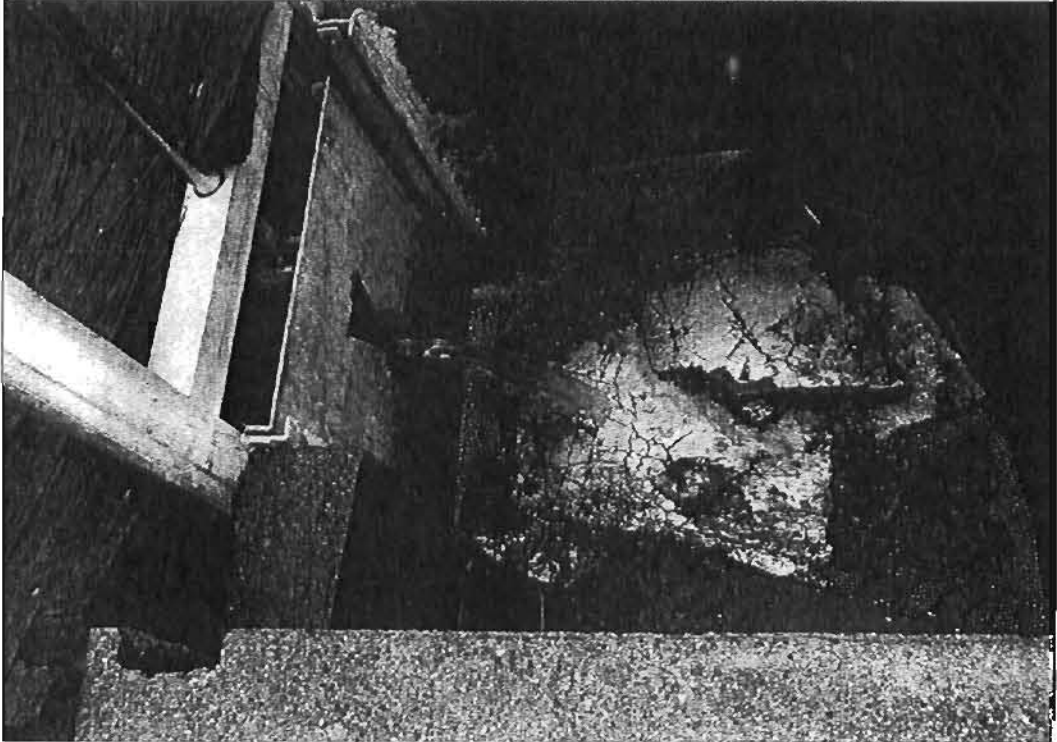
Facility/Site Name		City of Elk River Wastewater Treatment Facility	
Location/Address		P.O. Box H, 112 South 2nd Street, Elk River, ID 83827	
NPDES	ID0020362	Date	4/30/2010
Subject/Comments		Gopher and ground squirrel holes in Elk River WWTP dike	



Facility/Site Name		City of Elk River Wastewater Treatment Facility	
Location/Address		P.O. Box H, 112 South 2nd Street, Elk River, ID 83827	
NPDES	ID0020362	Date	4/30/2010
Subject/Comments		Elk River WWTP Transfer Structure	



Facility/Site Name		City of Elk River Wastewater Treatment Facility	
Location/Address		P.O. Box H, 112 South 2nd Street, Elk River, ID 83827	
NPDES	ID0020362	Date	4/30/2010
Subject/Comments		Styrofoam in Elk River WWTP Transfer Structure	



Facility/Site Name		City of Elk River Wastewater Treatment Facility	
Location/Address		P.O. Box H, 112 South 2nd Street, Elk River, ID 83827	
NPDES	ID0020362	Date	4/30/2010
Subject/Comments		Elk River WWTP Lab Results	

Anatek Labs, Inc.
 1000 Highway 10, Suite 100, Elk River, ID 83827
 Phone: (208) 765-1234
 Fax: (208) 765-1235
 Email: info@anateklabs.com

Client: CITY OF ELK RIVER
Address: P.O. BOX H
City: ELK RIVER, ID 83827

Project #: 2009-001
Project Name: ELK RIVER LAGOON

Analytical Results Report

Parameter	Result	Unit	Method	Standard Range	Notes
BOD	12	mg/L	5210.10	0-100	
TSS	15	mg/L	2540.05	0-100	

Signature: T. H. H. H.

Facility/Site Name		City of Elk River Wastewater Treatment Facility	
Location/Address		P.O. Box H, 112 South 2nd Street, Elk River, ID 83827	
NPDES	ID0020362	Date	4/30/2010
Subject/Comments		Elk River WWTP Lab Results	

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Signature: T. H. H. H.

Facility/Site Name		City of Elk River Wastewater Treatment Facility	
Location/Address		P.O. Box H, 112 South 2nd Street, Elk River, ID 83827	
NPDES	ID0020362	Date	4/30/2010
Subject/Comments		Elk River WWTP Chain of Custody	

Facility/Site Name		City of Elk River Wastewater Treatment Facility	
Location/Address		P.O. Box H, 112 South 2nd Street, Elk River, ID 83827	
NPDES	ID0020362	Date	4/30/2010
Subject/Comments		Elk River WWTP Chain of Custody	